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January 5, 2025

**VIA ECF**

Hon. Lewis J. Liman  
 United States District Court  
 Southern District of New York  
 500 Pearl Street  
 New York, NY 10007

Re: *Freeman et al. v. Giuliani*, No. 24-cv-6563 (LJL); No. 24-mc-353 (LJL)<sup>1</sup>

Dear Judge Liman:

Plaintiffs Ruby Freeman and Wandrea' Moss, Defendant Rudolph W. Giuliani, and Intervenor Andrew Giuliani respectfully submit this joint letter to request a one-day extension of the current pre-trial deadlines. ECF Nos. 104, 150.

The parties' joint pretrial submissions, including findings of fact and conclusions of law, are due January 6, 2025, at 5 p.m. ECF Nos. 104, 150. The Court previously denied the parties' joint request to extend those deadlines on the record at the January 3, 2025 hearing. The parties respectfully renew their request given a subsequent change of circumstances, namely that the Court has now determined that the continuation of the January 3, 2025 hearing on January 6, 2025 shall take place in person. ECF No. 183. Given the logistics of coordinating and finalizing the parties' joint pretrial submission, and the work involved in finalizing the parties' respective proposed findings of fact and conclusions of law—all of which will be complicated by the appearance of Plaintiffs' and Defendant's counsel in Court during the hours leading up to that filing deadline—the parties respectfully request the following extension of time:

Submission	Current Deadline	Proposed Deadline
Joint Pretrial Submission and related materials, including joint exhibit list and proposed findings of fact and conclusions of law <sup>2</sup>	1/6/2025 at 5 p.m.	1/7/2025 at 5 p.m.

<sup>1</sup> Unless otherwise noted, all docket references herein refer to No. 24-cv-6563 (LJL).

<sup>2</sup> Rather than submitting a letter of proposed exhibits and a joint exhibit list, now that the deadline for each submission has aligned on the same date and time, the parties propose that the Court permit them to submit a joint exhibit list and forgo the separate submission of individual letters.

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Submission	Current Deadline	Proposed Deadline
Motions in Limine	1/6/2025 at 5 p.m.	1/7/2025 at 5 p.m.

Respectfully submitted,

s/ Aaron E. Nathan